

# **Exhibit A**

**Serta Confirmation & Adversary Proceeding**  
**Schedule**

Action Item	Deadline
Defendants to file any amended/new counterclaims on the implied covenant of good faith and fair dealing	April 7, 2023 (as already agreed to by the parties)
Parties to serve any limited additional written or document discovery; parties to identify intended deponents	By April 10, 2023
Parties to meet and confer on limited additional written or document discovery and depositions	April 11, 2023, 1pm EDT
Parties to identify “may call” fact witnesses	April 12, 2023
Defendants/Counterclaimants/Third-Party Plaintiffs to provide FRCP 26(a)(1)(A)(iii) disclosures for any counterclaims – calculation of damages and supporting materials [Other Rule 26(a) disclosures already covered by interrogatory responses]	April 14, 2023
Parties to identify the names and backgrounds of affirmative expert witnesses they intend to use at confirmation and high level topics they anticipate such expert witnesses to be covering	April 17, 2023
Parties substantially complete limited additional written or document discovery, including supplementing or revising existing disclosures	April 20, 2023
Fact depositions begin (no earlier than)	April 21, 2023
Affirmative expert disclosures	April 24, 2023
Rebuttal expert disclosures	May 3, 2023
Confirmation objection deadline	May 4, 2023
Fact depositions to conclude (no later than)	May 5, 2023
Expert depositions to occur	May 5 – May 9, 2023
Exchange proposed witness & exhibit lists	May 5, 2023
Exchange proposed deposition designations	May 8, 2023
Exchange objections to proposed exhibit lists	May 9, 2023
Exchange deposition counter-designations	May 10, 2023
Parties to meet and confer on exhibits that can be admitted by stipulation	May 10, 2023
File briefs in support of confirmation, pre-trial briefs on good faith and fair dealing claims (if not covered in confirmation briefing), witness & exhibit lists, and deposition designations	May 12, 2023
Confirmation Hearing commences, including trial on implied covenant and DQ claims	May 15, 2023